

Exhibit "21"

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Venice PI, LLC,
MON LLC,
Millennium Funding, Inc.,
Bodyguard Productions, Inc.,
TBV Productions, LLC,
UN4 Productions, Inc., and
Hunter Killer Productions, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Venice PI, LLC et al.,)	Case No.: 1:19-cv-169-LEK-KJM
)	(Copyright)
Plaintiffs,)	
vs.)	
)	STIPULATED CONSENT
NGUYEN DINH MANH et. al.)	JUDGMENT BETWEEN
)	PLAINTIFFS AND
Defendants.)	DEFENDANTS SENTHIL VIJAY
)	SEGARAN AND TECHMODO
)	LIMITED
)	
)	

STIPULATED CONSENT JUDGMENT BETWEEN PLAINTIFFS
AND DEFENDANTS SENTHIL VIJAY SEGARAN AND TECHMODO
LIMITED

As attested to by the below signatures of counsel for the Plaintiffs Venice PI,

LLC, MON LLC, Millennium Funding, Inc., Bodyguard Productions, Inc., TBV Productions, LLC, UN4 Productions, Inc., and Hunter Killer Productions, Inc. (“Plaintiffs”), Defendant Senthil Vijay Segaran (“Segaran”) personally and on behalf of Defendant Techmodo Limited, for which Segaran is the sole shareholder and director, this matter comes before the Court on the parties’ joint Stipulated Consent Judgment.

Plaintiffs have filed a First Amended Complaint [Doc. #63] alleging that that Defendants Segaran and Techmodo Limited are liable for intentional inducement, contributory and direct copyright infringement per 17 U.S.C. §101 for distributing and promoting torrent files of Plaintiffs’ motion pictures.

The parties, after conferral and investigation, now appear, Defendant Segaran *pro se* on his behalf personally and also on behalf of Techmodo Limited, and Plaintiffs through counsel to fully and finally resolve all claims between the parties and the matters before the Court and have moved for entry of this Stipulated Consent Judgment.

WHEREFORE IT IS HEREBY STIPULATED AND ORDERED for all matters relevant to this case between the parties as follows:

1. The parties agree that the Court has personal jurisdiction over the parties and venue is proper.

2. The parties agree that Plaintiffs have valid and enforceable copyrights in the original copyrighted works as identified in Exhibit “1” [Doc. #63-1] of the First Amended Complaint.

3. Defendant Segaran acknowledges that he has received independent legal advice from counsel or has had the opportunity to seek advice from counsel, with respect to the facts and this Stipulated Consent Judgment.

4. Defendants Segaran and Techmodo Limited deny liability but acknowledge that Senthil Vijay Segaran is Defendant JOHN DOE dba YTS identified in the original complaint and concede that one or more third parties uploaded the torrent files of Plaintiffs’ motion pictures to their various website operating under the name “YTS”, and that said websites provided links for distributing the torrent files.

5. Pursuant to stipulation of the parties, the below Money Judgment, Permanent Injunction and Order is to be entered against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED.

6. The Parties give the Court authority to modify the permanent injunction and the time period for which it will retain jurisdiction to enforce the money judgment and permanent injunction of this Stipulated Consent Judgment.

MONEY JUDGMENT

A Money Judgment is awarded in favor of Plaintiff Venice PI, LLC against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

A Money Judgment is awarded in favor of Plaintiff MON, LLC against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

A Money Judgment is awarded in favor of Plaintiff Millennium Funding, Inc. against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

A Money Judgment is awarded in favor of Plaintiff Bodyguard Productions, Inc. against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

A Money Judgment is awarded in favor of Plaintiff TBV Productions, LLC against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

A Money Judgment is awarded in favor of Plaintiff UN4 Productions, Inc. against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

A Money Judgment is awarded in favor of Plaintiff Hunter Killer Productions, Inc. against Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

PERMANENT INJUNCTION

Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED and those under their control are hereby PERMANENTLY ENJOINED from directly, contributorily or indirectly infringing Plaintiffs' rights in their motion pictures.

Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED and those under their control are hereby PERMANENTLY ENJOINED from distributing and/or promoting torrent files of Plaintiffs' motion pictures.

This Court will retain jurisdiction until December 31, 2021 for the purposes of enforcing the Money Judgment, Permanent Injunction and Order.

Except as provided herein, each party is to bear their own costs and fees. With entry of this Consent Judgment, this matter is terminated with respect to Defendants SENTHIL VIJAY SEGARAN and TECHMODO LIMITED.

DATED: Kailua-Kona, Hawaii, March 23, 2020.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiffs

DATED: London, England, March 24, 2020.



Senthil Vijay Segaran, appearing *pro se* and in
behalf of Techmodo Limited as its sole
shareholder and director

APPROVED AND SO ORDERED:



/s/ Leslie E. Kobayashi
Leslie E. Kobayashi
United States District Judge

Venice PI, LLC, et al. v. Nguyen Dinh Manh, et al.; Case No. 1:19-cv-00169-LEK-KJM; STIPULATED CONSENT JUDGMENT BETWEEN PLAINTIFFS AND DEFENDANTS SENTHIL VIJAY SEGARAN AND TECHMODO LIMITED